
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been
assigned)

-against-

COMPLAINT

Do you want a jury trial?

☐ Yes ☐ No

Write the full name of each defendant. If you need more
space, please write "see attached" in the space above and
attach an additional sheet of paper with the full list of
names. The names listed above must be identical to those
contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ **Federal Question**
- ☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

First Name	Middle Initial	Last Name
Street Address		
County, City	State	Zip Code
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

Date(s) of occurrence:

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

	/s/ Simon Chikhladze	
Dated	Plaintiff's Signature	
First Name	Middle Initial	Last Name
Street Address		
County, City	State	Zip Code
Telephone Number		Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



Simon Chikhladze <simeonc57@gmail.com>

Confirmation for reservation Chikhladze, Tbilisi, 29 February.

webmaster@amadeus.net <webmaster@amadeus.net>

Mon, Jan 29, 2024 at 6:02 AM

To: simeonc57@gmail.com

Cc: ticketcoupon@airdolomiti.it

Your booking confirmation

Thank you for choosing Air Dolomiti. You can check your reservation details here below:

Your trip reservation

Booking reservation number: LDQVXQ

Trip status: Confirmed

- The online check-in service is available from 23 hours before departure on our website www.airdolomiti.eu
- We recommend you make a note of the booking reservation number or print this mail.

Traveller information

Mr Simon Chikhladze

Mrs Ketevan Chikhladze

Contact Information

E-Mail: simeonc57@gmail.com

Phone contact 2: +995 571598008

Electronic Tickets

Purchased ticket numbers as follows:

Document 220-2527643716: Tbilisi - Tbilisi Simon Chikhladze

Document 220-2527643717: Tbilisi - Tbilisi Ketevan Chikhladze

Your flight selection

Tbilisi to Geneva

Flight 1 Thursday, February 29, 2024

Status: confirmed Departure: 05:50 Tbilisi, Georgia - International

Arrival: 07:10 Munich, Germany - Munich International, terminal 2

Airline Lufthansa LH 2559

Aircraft: Airbus A321neo

Fare type: Economy

Last check in: information not available

Baggage: 0 piece(s) per traveller

Change of plane required. Time between flights : 4:10.

Flight 2 Thursday, February 29, 2024

Status: confirmed Departure: 11:20 Munich, Germany - Munich International, terminal 2

Arrival: 12:30 Geneva, Switzerland - Geneva International

Airline Lufthansa LH 9432

Aircraft: Embraer 195

Operated by Air Dolomiti

Last check in: information not available

Fare type: Economy

Baggage: 0 piece(s) per traveller

Geneva to Tbilisi

Flight 1 Monday, March 04, 2024

Status: confirmed Departure: 17:10 Geneva, Switzerland - Geneva International

Arrival: 18:25 Munich, Germany - Munich International, terminal 2

Airline Lufthansa LH 9435

Aircraft: Embraer 195

Operated by Air Dolomiti

Last check in: information not available

Fare type: Economy

Baggage: 0 piece(s) per traveller

Change of plane required. Time between flights : 3:25.

Flight 2 Monday, March 04, 2024

Status: confirmed Departure: 21:50 Munich, Germany - Munich International, terminal 2
04:45
Arrival: +1 day(s) Tbilisi, Georgia - International

Airline Lufthansa LH 2558 Aircraft: Airbus A321neo
Fare type: Economy Last check in: information not available
Baggage: 0 piece(s) per traveller

Notes

- Please note that seat preferences during check-in are subject to availability.
- You will find information about baggage allowances and about special services at www.airdolomiti.eu.
- Special rules and/or restrictions may apply to this fare.
- Taxes and supplements included. You will receive a separate e-mail with your payment receipt.

Baggage Policy

Tbilisi to Geneva

Simon Chikhladze First CHECKED BAG (0 piece(s)) FREE BAGGAGE ALLOWANCE:
Free

Ketevan Chikhladze First CHECKED BAG (0 piece(s)) FREE BAGGAGE ALLOWANCE:
Free

Geneva to Tbilisi

Simon Chikhladze First CHECKED BAG (0 piece(s)) FREE BAGGAGE ALLOWANCE:
Free

Ketevan Chikhladze First CHECKED BAG (0 piece(s)) FREE BAGGAGE ALLOWANCE:
Free

Most Significant Carrier is LH (Lufthansa)

Baggage Disclaimer

BAGGAGE ALLOWANCE AND CHARGES ARE PROVIDED FOR INFORMATION ONLY. ADDITIONAL DISCOUNTS MAY APPLY DEPENDING ON FLYER-SPECIFIC FACTORS (E.G. FREQUENT FLYER STATUS, MILITARY, CREDIT CARD USED FOR PURCHASE, EARLY PURCHASE OVER THE INTERNET, ETC.)

Munich to Geneva

Simon Chikhladze First Carry-on Bag (1 piece(s)) CARRYON HAND BAGGAGE ALLOWANCE:
CARRY8KG 18LB UPTO46LI 118LCM - MAXIMUM WEIGHT PER PEICE 8KG AND MAXIMUM SIZE
FreePER PIECE 55 X 40X 23CM. EXCEPTION APPLIES FOR A GARMENT BAG - MAXIMUM SIZE 57 X 54
X 15CM

Ketevan Chikhladze First Carry-on Bag (1 piece(s)) CARRYON HAND BAGGAGE ALLOWANCE:
CARRY8KG 18LB UPTO46LI 118LCM - MAXIMUM WEIGHT PER PEICE 8KG AND MAXIMUM SIZE
FreePER PIECE 55 X 40X 23CM. EXCEPTION APPLIES FOR A GARMENT BAG - MAXIMUM SIZE 57 X 54
X 15CM

Geneva to Munich

Simon Chikhladze First Carry-on Bag (1 piece(s)) CARRYON HAND BAGGAGE ALLOWANCE:
CARRY8KG 18LB UPTO46LI 118LCM - MAXIMUM WEIGHT PER PEICE 8KG AND MAXIMUM SIZE
FreePER PIECE 55 X 40X 23CM. EXCEPTION APPLIES FOR A GARMENT BAG - MAXIMUM SIZE 57 X 54
X 15CM

Ketevan Chikhladze First Carry-on Bag (1 piece(s)) CARRYON HAND BAGGAGE ALLOWANCE:
CARRY8KG 18LB UPTO46LI 118LCM - MAXIMUM WEIGHT PER PEICE 8KG AND MAXIMUM SIZE
FreePER PIECE 55 X 40X 23CM. EXCEPTION APPLIES FOR A GARMENT BAG - MAXIMUM SIZE 57 X 54
X 15CM

Most Significant Carrier is EN (Air Dolomiti)

Carry-on Baggage Disclaimer

CARRY-ON BAGGAGE ALLOWANCE AND CHARGES ARE PROVIDED FOR INFORMATION ONLY. ADDITIONAL DISCOUNTS MAY APPLY DEPENDING ON FLYER-SPECIFIC FACTORS (E.G. FREQUENT FLYER STATUS, MILITARY, CREDIT CARD USED FOR PURCHASE, EARLY PURCHASE OVER THE INTERNET, ETC.)

Tbilisi to Munich

Simon Chikhladze First Carry-on Bag (1 piece(s)) CARRYON HAND BAGGAGE ALLOWANCE:
CARRY8KG 18LB UPTO46LI 118LCM - MAXIMUM WEIGHT PER PEICE 8KG AND MAXIMUM SIZE
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FreePER PIECE 55 X 40X 23CM. EXCEPTION APPLIES FOR A GARMENT BAG - MAXIMUM SIZE 57 X 54
X 15CM

Munich to Tbilisi

Simon First Carry-on Bag (1 piece(s)) CARRYON HAND BAGGAGE ALLOWANCE:
Chikhladze CARRY8KG 18LB UPTO46LI 118LCM - MAXIMUM WEIGHT PER PEICE 8KG AND MAXIMUM SIZE
FreePER PIECE 55 X 40X 23CM. EXCEPTION APPLIES FOR A GARMENT BAG - MAXIMUM SIZE 57 X 54
X 15CM

Ketevan First Carry-on Bag (1 piece(s)) CARRYON HAND BAGGAGE ALLOWANCE:
Chikhladze CARRY8KG 18LB UPTO46LI 118LCM - MAXIMUM WEIGHT PER PEICE 8KG AND MAXIMUM SIZE
FreePER PIECE 55 X 40X 23CM. EXCEPTION APPLIES FOR A GARMENT BAG - MAXIMUM SIZE 57 X 54
X 15CM

Most Significant Carrier is LH (Lufthansa)

Carry-on Baggage Disclaimer

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- **Legend:**
- LB = WEIGHT IN POUNDS,
- IN = LENGTH IN INCHES,
- KG = WEIGHT IN KILOS
- CM= LENGTH IN CENTIMETERS

Services

No selected services

Contacts

Air Dolomiti - Sales Center

From Monday to Friday h. 08.30am - 08.00pm / Saturday and Sunday h. 9.00am - 05.00pm

Bank holidays excluded

+39 045 2886140 (English and Italian)

+49 (0)89 97580497 (German, guaranteed from Mon. to Fri. 9.00am-5.00pm)

salescenter@airdolomiti.it

www.airdolomiti.eu

This case raises issues under federal law. Specifically, denial of rights under:

- Article 3 of the 1951 Refugee Convention and 1967 Protocol regarding the principle of non-refoulement and prohibiting return to risk of persecution.
- The Fifth Amendment Due Process Clause of the U.S. Constitution regarding protections in deportation and removal proceedings.
- Federal statutes governing international air transportation (49 U.S.C. § 40103) based on claims of being twice denied boarding on international flights departing from Tbilisi Airport.
- Federal immigration statutes (8 U.S.C. § 1231) regarding detention and removal of aliens, related to involuntary deportations from Germany and Denmark despite pending asylum applications.

Applicable International Law

The prohibition of torture is a peremptory norm of international law *jus cogens* which cannot be derogated from. As established by Article 5 of the Universal Declaration of Human Rights, Article 7 of the International Covenant on Civil and Political Rights, Article 3 of the European Convention on Human Rights, and Article 4 of the EU Charter of Fundamental Rights, the obligation to protect individuals from torture and to investigate and condemn acts of torture is an obligation owed by all States *erga omnes*.

This is demonstrated by specific protocols and control mechanisms adopted at the European and international levels, which reflect the paramount importance attributed by the international community to upholding this inviolable norm.

A handwritten signature in blue ink, appearing to be 'Cham S', with a horizontal line underneath.

1. Personal Background:

- I, Simon Chikhladze, former Soviet (currently Georgia) citizen, am a temporary resident of the United States seeking asylum under I-589.

2. Unlawful Deportation and Human Rights Violations:

- In 2019, I was unlawfully deported from Germany to Denmark, and subsequently from Denmark to Georgia, despite being a failed asylum seeker entitled to appeal under Article 4 of the EU Charter of Fundamental Rights and Directive 2013/32/EU.

- My deportation violated the principle of non-refoulement as I faced persecution and torture in Georgia.

3. Current Circumstances and Abuse:

- I have been homeless in Georgia, suffering from grave human rights violations, torture, and inhumane treatment at 38 Mitskevich Str., Tbilisi.

- The perpetrators, including individuals known as Julia, Ana, Lolita, Magomed, and others, operate with impunity, under the watchful eye of crime supervisors Jinori and "Iraklyi".

4. Specific Incidents of Abuse:

- I was confined without heat or hot water for two winters and forced to stay in a hospice and a probation facility under inhumane conditions.

- At my current residence, I endure sleep deprivation, psychological harm, and physical torture using various techniques and tools.

5. Obstacles to Leaving Georgia:

- My attempts to leave the country legally were thwarted by influential individuals, including the former Chairman of the Georgian Parliament Nino Burdjanadze, wife of former head of Georgian border police, who orchestrated my removal from flights.

- On November 16, 2023, I was denied boarding on my Lufthansa flight from Tbilisi to Barcelona due to the theft of my passport and my sister's passport by an individual named Giviko. This incident occurred just before our scheduled departure, effectively stranding us and preventing our travel. The theft was premeditated, as Giviko and others are part of a criminal group operating from 38 Mitskevich Street, known for their anti-American sentiments. This group includes individuals like Jinori, Iraklyi, and Julia, who have demonstrated hostility towards me as a U.S. ID holder and as an asylee under U.S. protection.

- Another denial of boarding on my Lufthansa flight from Tbilisi to Geneva was compounded by Burjanadze, who unlawfully acted on insider information regarding my travel plans for February 29, 2024. Despite possessing all necessary travel documents, including an outbound boarding pass and travel confirmation, I was arbitrarily required to show an “inbound boarding pass” — a document not provided by airlines until the return journey begins. This request was a bad faith pretext aimed at obstructing my departure.

- The actions of Giviko and Burjanadze, along with the complicity of other individuals involved, constitute a pattern of targeting and harassment that has caused me significant distress and harm, violating my rights and obstructing my freedom of movement.

6. Request for Justice:

- I am seeking justice for these crimes, accountability for the perpetrators, and protection of my fundamental human rights as outlined in Articles 13, 14, and 15 of the Universal Declaration of Human Rights.

A handwritten signature in blue ink, appearing to be 'Chm' followed by a stylized flourish.

INJURIES AND MEDICAL TREATMENT:

1. Physical Injuries:

- I have suffered from physical harm due to sleep deprivation, biological energy depletion, and strokes inflicted through torture techniques at my current residence.
- The use of a magnetic field purportedly to induce mental disorder has caused significant physical distress.

2. Psychological Harm:

- The ongoing abuse and inhumane treatment have led to severe psychological trauma, including anxiety, fear, and emotional distress.

3. Lack of Medical Treatment:

- Despite the severity of my physical and psychological injuries, I have been unable to access appropriate medical treatment due to my precarious living situation and lack of resources.
- The conditions in which I have been forced to live, such as confinement without heat or hot water, have exacerbated my injuries and further hindered my ability to seek medical help.

4. Impact on Well-being:

- The combined physical and psychological injuries have severely impacted my overall well-being, leaving me vulnerable and in urgent need of protection and medical care.

A handwritten signature in blue ink, appearing to read 'Chen' followed by a stylized flourish.

RELIEF REQUESTED:

1. Compensatory Damages:

- Request for monetary compensation for the physical and psychological injuries suffered as a result of the unlawful deportation, torture, and inhumane treatment, including medical expenses and emotional distress.

2. Punitive Damages:

- Request for punitive damages to hold the responsible parties accountable for their egregious actions and to deter similar conduct in the future.

3. Injunctive Relief:

- Request for a court order to ensure my immediate protection from further harm and to prevent the perpetrators from continuing their abusive actions.

4. Declaratory Relief:

- Request for a declaration from the court affirming that the actions against me violated my human rights under international law, including the Universal Declaration of Human Rights.

5. Assistance with Asylum and Relocation:

- Request for assistance in securing asylum in a safe country and support for relocation and integration, ensuring my safety and well-being.

6. Compensatory Damages:

- Request for monetary compensation for the physical and psychological injuries suffered due to unlawful actions, including theft of travel documents and denial of boarding, which have caused significant emotional distress and financial losses.

7. Legal Fees and Costs:

- Request for coverage of all legal fees and costs incurred in pursuing this case to relieve the financial burden associated with seeking justice.

8. Any Other Relief:

Grant such other and further relief as this Court deems just and proper to protect my as Plaintiff's rights, as well as the rights of my dependent sister, under existing law and international regulations.

A handwritten signature in blue ink, appearing to read 'Chen' followed by a stylized flourish.

**Lufthansa****M**

Boarding Pass

CHIKHLADZE / KETEVAN MRS

Name

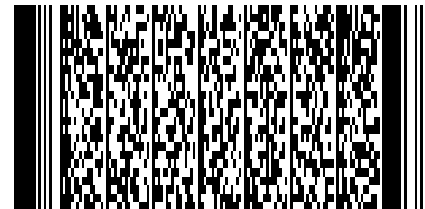
0036

Passenger Status

Sec. no.

ECO LIGHT

Class

**TBS**

Tbilisi

**MUC**

Munich

29Feb24

Date

API

**LH2559**

...

Terminal

....

Gate

04:50

29Feb24

GROUP 4

Boarding Time

05:35

29Feb24

Gate closes

**14E**

Seat

Please be at the departure gate at the boarding time stated. Otherwise your seat may be reassigned.

Please observe possible gate changes.*Baggage drop-off**

Check-in counter

Until 05:00

50

Digital Enhancements

Download the Lufthansa App to stay up to date and receive changes related to your flight.

→ www.lufthansa.com/apps

Have a read on your upcoming flight with the Lufthansa eJournals.

Download latest magazines and newspapers now.

→ www.lufthansa.com/eJournals**Dangerous / prohibited goods**

To ensure your safety on board it is prohibited to transport some items in your checked or in your carry-on baggage. Please find more information at:

→ www.lufthansa.com/en/en/dangerous-goods**Important Notice:**

For this air travel the Montreal Convention or the Warsaw Convention may be applicable and these Conventions limit the liability of carriers in respect of loss of or damage to baggage and for delay. In the case of death or bodily injury no financial limits apply under the Montreal Convention and for European Community carriers; for damage up to the equivalent of 113.100 Special Drawing Rights (SDR) carriers are liable regardless of negligence.

Carriage on Lufthansa German Airlines is subject to its conditions of carriage, tariff and other conditions.

Ticket information

Booking reference: LDQVXQ

Ticket number ETKT: 220 2527643717



**Lufthansa****M**

Boarding Pass

CHIKHLADZE / KETEVAN MRS

Name

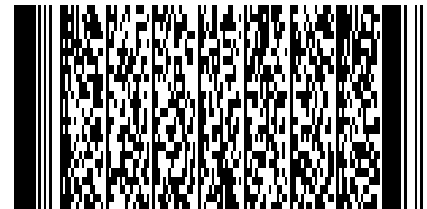
0016

Passenger Status

Sec. no.

ECO LIGHT

Class

**MUC**

Munich

**GVA**

Geneva

29Feb24

Date

EN8070**2**

Terminal

G35

Gate

10:50 **11:05**

29Feb24

GROUP 3

Boarding Time

Gate closes

**25A**

Seat

Please be at the departure gate at the boarding time stated. Otherwise your seat may be reassigned.

***Please observe possible gate changes.**

Ticket information

Booking reference: LDQVXQ

Ticket number ETKT: 220 2527643717

Digital Enhancements

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Dangerous / prohibited goods

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**Lufthansa****M**

Boarding Pass

CHIKHLADZE / SIMON MR

Name

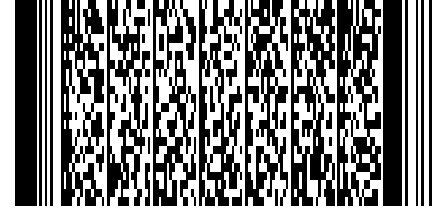
0037

Passenger Status

Sec. no.

ECO LIGHT

Class

**TBS**

Tbilisi

**MUC**

Munich

29Feb24

Date

API

**LH2559**

...

Terminal

....

Gate

04:50

29Feb24

GROUP 4

Boarding Time

**05:35**

29Feb24

Gate closes

**14D**

Seat

Please be at the departure gate at the boarding time stated. Otherwise your seat may be reassigned.

Please observe possible gate changes.*Baggage drop-off**

Check-in counter

Until 05:00

50

Digital Enhancements

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→ www.lufthansa.com/apps

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To ensure your safety on board it is prohibited to transport some items in your checked or in your carry-on baggage. Please find more information at:

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Carriage on Lufthansa German Airlines is subject to its conditions of carriage, tariff and other conditions.

Ticket information

Booking reference: LDQVXQ

Ticket number ETKT: 220 2527643716

**Lufthansa****M**

Boarding Pass

CHIKHLADZE / SIMON MR

Name

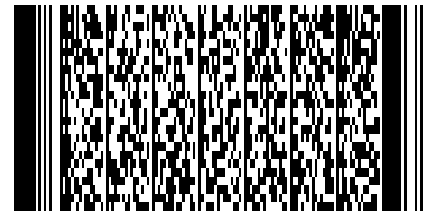
0017

Passenger Status

Sec. no.

ECO LIGHT

Class

**MUC**

Munich

**GVA**

Geneva

29Feb24

Date

EN8070**2**

Terminal

G35

Gate

10:50 **11:05**

29Feb24

GROUP 3

Boarding Time

Gate closes

**25C**

Seat

Please be at the departure gate at the boarding time stated. Otherwise your seat may be reassigned.

***Please observe possible gate changes.**

Ticket information

Booking reference: LDQVXQ

Ticket number ETKT: 220 2527643716

Digital Enhancements

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Carriage on Lufthansa German Airlines is subject to its conditions of carriage, tariff and other conditions.



In partnership with



Booking confirmation
CONFIRMATION NUMBER: 4132.796.983
PIN CODE: 0432

hotelF1 Thonon Les Bains Est

Address: Pont de Drance CD 32, 74200 Marin, France

Phone: +33 891 70 54 06

GPS coordinates: N 046° 22.917, E 06° 30.513

CHECK-IN

29

FEBRUARY

Thursday

from 14:00

CHECK-OUT

4

MARCH

Monday

until 12:00

ROOMS

1

/

4

NIGHTS

1

/

4

PRICE

1 room

10 % VAT

Price

(for 2 guests)

Additional charges

The price you see below is an approximate that may include fees based on the maximum occupancy. This can include taxes set by local governments or charges set by the property.

City tax (GEL 1.44 × 2 guests × nights)

Final price

(taxes included)

GEL 471

GEL 47

approx. **GEL 518**

€ 179.76

GEL 12

approx. GEL 530

You'll pay 183.76 in EUR.

The final price shown is the amount you will pay to the property.

Booking.com does not charge guests any reservation, administration or other fees.

Your card issuer may charge you a foreign transaction fee.

Payment information

hotelF1 Thonon Les Bains Est handles all payments.

This property accepts the following forms of payment: American Express, Visa, Mastercard

Currency and exchange rate information

You'll pay hotelF1 Thonon Les Bains Est in EUR according to the exchange rate on the day of payment.

The amount displayed in GEL is just an estimate based on **today's** exchange rate for EUR.

Additional information

Please note that additional supplements (e.g. extra bed) are not added in this total.

If you cancel, applicable taxes may still be charged by the property.

If you don't show up at this booking, and you don't cancel beforehand, the property is liable to charge you the full reservation amount.

Please remember to read the **Important information** below, as this may contain important details not mentioned here.

Tandem Room with Shared Bathroom

Guest name: Simon Chikhladze / for 2 Adults, 1 child (up to 0 years of age)

Meal Plan: There is no meal option with this room.

Linen • Desk • TV • Shared toilet • Shared bathroom • Heating • Flat-screen TV • Towels/sheets (extra fee) • Wake-up service • Alarm clock • Clothes rack • Toilet paper

Bed Size(s): 1 double bed (131-150 cm wide)

Prepayment : No prepayment is needed.

Cancellation cost:

until 28 February 2024 23:59 [CET]: € 0

from 29 February 2024 00:00 [CET]: **€ 44.94 –**

Changing the dates of your stay is not possible.

Important information

Please note that there is a shared bathroom on each floor.

Reception opening hours:

Monday to Friday: 6:30 to 9:30 and 17:00 to 21:00

Saturdays, Sundays and public holidays: 07:30 to 10:30 and 17:00 to 21:00.

Outside of reception hours, guests can check in with the machine outside.

To be more eco-friendly, this property does not provide standard towels. Guests can purchase a microfibre towel at the hotel at an extra cost of EUR 3.

In response to Coronavirus (COVID-19), additional safety and sanitation measures are in effect at this property.

Food & beverage services at this property may be limited or unavailable due to Coronavirus (COVID-19).

Due to Coronavirus (COVID-19), wearing a face mask is mandatory in all indoor common areas.

Hotel Policies

Guest parking

- Free private parking is possible on site (reservation is not needed).
- WiFi is available in all areas and is free of charge.

Need help?

You can always view, change or cancel your booking online at: [your.booking.com](https://www.booking.com)

For any questions related to the property, you can contact hotelF1 Thonon Les Bains Est directly on:

+33 891 70 54 06

Or contact us by phone - we're available 24 hours a day:

When abroad or from France: +44 20 3320 2609

Travel with peace of mind

Find more information about travelling safely in our [Safety resource centre](#)

Your safety is our top concern. In case of an emergency while on holiday, dial 112 to reach police, the fire brigade, or emergency medical services. This number works in most European countries and is free of charge.

Find more [local emergency phone numbers](#) to help give you complete peace of mind during your stay in France.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Write the full name of each plaintiff.

_____CV_____
(Include case number if one has been
assigned)

-against-

COMPLAINT

Do you want a jury trial?

☐ Yes ☐ No

Write the full name of each defendant. If you need more
space, please write "see attached" in the space above and
attach an additional sheet of paper with the full list of
names. The names listed above must be identical to those
contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ **Federal Question**
- ☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

First Name	Middle Initial	Last Name
Street Address		
County, City	State	Zip Code
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<hr/>		
	First Name	Last Name	
	<hr/>		
	Current Job Title (or other identifying information)		
	<hr/>		
	Current Work Address (or other address where defendant may be served)		
	<hr/>		
	County, City	State	Zip Code
Defendant 2:	<hr/>		
	First Name	Last Name	
	<hr/>		
	Current Job Title (or other identifying information)		
	<hr/>		
	Current Work Address (or other address where defendant may be served)		
	<hr/>		
	County, City	State	Zip Code
Defendant 3:	<hr/>		
	First Name	Last Name	
	<hr/>		
	Current Job Title (or other identifying information)		
	<hr/>		
	Current Work Address (or other address where defendant may be served)		
	<hr/>		
	County, City	State	Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: _____

Date(s) of occurrence: _____

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

	/s/ Simon Chikhladze	
Dated	Plaintiff's Signature	
First Name	Middle Initial	Last Name
Street Address		
County, City	State	Zip Code
Telephone Number		Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.



**United States District Court
Southern District of New York**

Pro Se (Nonprisoner) Consent to Receive Documents Electronically

Parties who are not represented by an attorney and are not currently incarcerated may choose to receive documents in their cases electronically (by e-mail) instead of by regular mail. Receiving documents by regular mail is still an option, but if you would rather receive them only electronically, you must do the following:

1. Sign up for a PACER login and password by contacting PACER¹ at www.pacer.uscourts.gov or 1-800-676-6856;
2. Complete and sign this form.

If you consent to receive documents electronically, you will receive a Notice of Electronic Filing by e-mail each time a document is filed in your case. After receiving the notice, you are permitted one “free look” at the document by clicking on the hyperlinked document number in the e-mail.² Once you click the hyperlink and access the document, you may not be able to access the document for free again. After 15 days, the hyperlink will no longer provide free access. Any time that the hyperlink is accessed after the first “free look” or the 15 days, you will be asked for a PACER login and may be charged to view the document. For this reason, *you should print or save the document during the “free look” to avoid future charges.*

IMPORTANT NOTICE

Under Rule 5 of the Federal Rules of Civil Procedure, Local Civil Rule 5.2, and the Court’s Electronic Case Filing Rules & Instructions, documents may be served by electronic means. If you register for electronic service:

1. You will no longer receive documents in the mail;
2. If you do not view and download your documents during your “free look” and within 15 days of when the court sends the e-mail notice, you will be charged for looking at the documents;
3. This service does *not* allow you to electronically file your documents;
4. It will be your duty to regularly review the docket sheet of the case.³

¹ Public Access to Court Electronic Records (PACER) (www.pacer.uscourts.gov) is an electronic public access service that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts, and the PACER Case Locator over the internet.

² You must review the Court’s actual order, decree, or judgment and not rely on the description in the email notice alone. See ECF Rule 4.3

³ The docket sheet is the official record of all filings in a case. You can view the docket sheet, including images of electronically filed documents, using PACER or you can use one of the public access computers available in the Clerk’s Office at the Court.

CONSENT TO ELECTRONIC SERVICE

I hereby consent to receive electronic service of notices and documents in my case(s) listed below. I affirm that:

1. I have regular access to my e-mail account and to the internet and will check regularly for Notices of Electronic Filing;
2. I have established a PACER account;
3. I understand that electronic service is service under Rule 5 of the Federal Rules of Civil Procedure and Rule 5.2 of the Local Civil Rules, and that I will no longer receive paper copies of case filings, including motions, decisions, orders, and other documents;
4. I will promptly notify the Court if there is any change in my personal data, such as name, address, or e-mail address, or if I wish to cancel this consent to electronic service;
5. I understand that I must regularly review the docket sheet of my case so that I do not miss a filing; and
6. I understand that this consent applies only to the cases listed below and that if I file additional cases in which I would like to receive electronic service of notices of documents, I must file consent forms for those cases.

Civil case(s) filed in the Southern District of New York:

Note: This consent will apply to all cases that you have filed in this court, so please list all of your pending and terminated cases. For each case, include the case name and docket number (for example, John Doe v. New City, 10-CV-01234).

Name (Last, First, MI)

Address

City

State

Zip Code

Telephone Number

E-mail Address

/s/ Simon Chikhladze

Date

Signature

Return completed form to:

Pro Se Intake Unit (Room 200)
500 Pearl Street
New York, NY 10007

DECISION (Translation)

Regarding the refusal of a Georgian citizen to travel to a Schengen/EU country.

The Georgian Ministry of Internal Affairs looked at the reasons for denying border crossing of a citizen of Georgia wishing to travel to a Schengen zone country of the European Union with a visa-free travel regime and decided to refuse to leave the country to citizen (passenger) Ketevan Chikhladze (name, surname) 01009005878 (number of travel document) LH 2559 Munich (final destination Switzerland) (transport company) on the following ground(s):

A) The person is not allowed to enter the Schengen/EU country he wants to visit. Note: empty

B) According to Georgian law, the person did not provide:

B.a) a relevant biometric passport issued within the last 10 years, the validity period of which is not less than 3 months for time of leave the Schengen area of the EU territory by a citizen of Georgia. Note: empty

B.b) **Inbound passenger ticket or proof of valid booking of the inbound passenger ticket** Note: highlighted

B.c) **Proof of a hotel reservation or place to stay. Confirmation of the right to live in this hotel, the consent of the host to accommodate a citizen of Georgia in his place of residence, as well as information about the address of the said hotel's place of residence.** Note: highlighted

B.d) a document confirming travel health insurance valid in the Schengen zone/European Union. Note: empty

B.e) **Proof of sufficient funds for the trip.** Note: highlighted

The presented decision could be appeal by the concerned party within 10 (ten) days after its introduction to the Patrol Police Department of the Ministry of Internal Affairs of Georgia (address: Tbilisi, 38 Ramishvili St.)

Signature of an authorized official of the Patrol Police of the Ministry of Internal Affairs of Georgia: **signed**

Signature of the person (passenger) wishing to leave Georgia: **not signed**

Date of decision: 29.02.2024

Place of the Seal of the Patrol Police Department of the Ministry of Internal Affairs of Georgia: **NO SEAL**

CERTIFICATE

I, Simon Chikhladze, certify that I am fluent in English and Georgian, and that the attached document is an accurate translation of the document attached entitled DECISION.

Signature: /s/ Simon Chikhladze

DECISION (Translation)

Regarding the refusal of a Georgian citizen to travel to a Schengen/EU country.

The Georgian Ministry of Internal Affairs looked at the reasons for denying border crossing of a citizen of Georgia wishing to travel to a Schengen zone country of the European Union with a visa-free travel regime and decided to refuse to leave the country to citizen (passenger) Simon Chikhladze (name, surname) 01024007141 (number of travel document) LH 2559 Munich (final destination Switzerland) (transport company) on the following ground(s):

A) The person is not allowed to enter the Schengen/EU country he wants to visit. Note: empty

B) According to Georgian law, the person did not provide:

B.a) a relevant biometric passport issued within the last 10 years, the validity period of which is not less than 3 months for time of leave the Schengen area of the EU territory by a citizen of Georgia. Note: empty

B.b) **Inbound passenger ticket or proof of valid booking of the inbound passenger ticket** Note: highlighted

B.c) **Proof of a hotel reservation or place to stay. Confirmation of the right to live in this hotel, the consent of the host to accommodate a citizen of Georgia in his place of residence, as well as information about the address of the said hotel's place of residence.** Note: highlighted

B.d) a document confirming travel health insurance valid in the Schengen zone/European Union. Note: empty

B.e) **Proof of sufficient funds for the trip.** Note: highlighted

The presented decision could be appeal by the concerned party within 10 (ten) days after its introduction to the Patrol Police Department of the Ministry of Internal Affairs of Georgia (address: Tbilisi, 38 Ramishvili St.)

Signature of an authorized official of the Patrol Police of the Ministry of Internal Affairs of Georgia: **signed**

Signature of the person (passenger) wishing to leave Georgia: **not signed**

Date of decision: 29.02.2024

Place of the Seal of the Patrol Police Department of the Ministry of Internal Affairs of Georgia: **NO SEAL**

CERTIFICATE

I, Simon Chikhladze, certify that I am fluent in English and Georgian, and that the attached document is an accurate translation of the document attached entitled DECISION.

Signature: /s/ Simon Chikhladze



137 West 26th Street, 11th Floor
New York, NY 10001
Phone : +1 845-664-6186
Fax : +1 212-763-0475

Billing Invoice

CheapOair.com: 81386927 | s*****7@gmail.com | Booked On Sat, Jul 8, 2023

Billing Details

Cardholder: Simon Chikhladze

DATE	PRODUCT	DESCRIPTION	CARD NUMBER	AMOUNT
07/08/2023	Airline Ticket Cost - Simon Chikhladze	Lufthansa 22080341245104	****4210	\$ 186.50
07/08/2023	Airline Ticket Cost - Ketevan Chikhladze	Lufthansa 22080341245115	****4210	\$ 186.50
07/08/2023	Agency Service Fee	CheapOair.com AIR	****4210	\$ 24.60
Total Booking Charge				\$ 397.60



Ministry of Internal Affairs of Georgia

Service agency

21st km of the Tbilisi-Red Bridge highway. Tel: 241 91 91

20/03/2024

N: 318373436515035



Notice
About the conviction

According to the data of the Ministry of Internal Affairs of Georgia, citizen Ketevan Chikhladze, born on 13.07.1959, P/N 01009005878, resident of Tbilisi, has not been convicted and is not wanted.

Information-Analytical Department

Information center

The document is electronic and is available on the website <https://www.sa.gov.ge/notices>. It can be downloaded with the date and number of the document. A printout of an electronic document is a copy of it.



საქართველოს შინაგან საქმეთა სამინისტრო
მომსახურების სააგენტო

თბილისი-წითელი ხიდის გამაგებილის 21-ე კმ. გელა 241 91 91

15/03/2024

N: 317961256205445



Notice
About the conviction

Information Center of the Information and Analytical Department of the Ministry of Internal Affairs of Georgia

According to the data, citizen Simon Chikhladze, born on 03.08.1952, P/N 01024007141, resident of Georgia, Tbilisi, Tina Iosebidze Street, N 72, Apartment 1, has not been convicted and is not wanted.

The document is electronic and is available on the website <https://www.sa.gov.ge/notices>, it can be downloaded with the date and number of the document. A printout of an electronic document is a copy of it.



Lufthansa

Refund

THIS DOCUMENT WAS ISSUED UPON CUSTOMER'S REQUEST ACCORDING TO THE PASSENGER .THE ORIGINAL DOCUMENT DOES NOT EXIST ANYMORE

Lufthansa address:

Deutsche Lufthansa AG
Venloer Straße 151 -153
D- 50672 Köln
GERMANY

Date of issue: 08-Mar-24	Country code: US	Ticket type:	IATA number: 33993923	Sales indicator:	PNR Code:
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Office ID: NYCLH0161	Tour code:	Fare Calc Mode:	Routing: TBS MUC
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Name of passenger (not transferable): CHIKHLADZE/SIMON MR	Customer ID:	Issued in connection	MUC BCN
--------------------------------------------------------------	--------------	----------------------	---------

FOID:	BCN MUC
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Endorsement restrictions:	Conj. Tkt. No.: MUC TBS
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Original issue:	Date of OI: 08-Jul-23	City of OI:	IATA-No. of OI:	Issued in exchange for:	Coupon-No.:	IATA-No.:
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Frequent Flyer Reference:

Fare calculation:

Fare:	Ticket. Ind.:	Equiv. fare paid:	Tax1:	Tax2:	Tax3:	Total:	Cash&Miles certificate:
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CCCAXXXXXXXXXXXXX4210/0527

Form of payment:

Fare: ¹
USD 0.00

Taxes,Fees and Airline Charges: ¹		
USD	-0.70	OG
USD	-25.00	GE
USD	-36.70	RA
USD	-14.70	JD
USD	-3.60	QV
USD	-9.90	DE
USD	-6.70	JA

Total:
USD -97.30

Fee Description:

2208034124511

¹ The net amount is calculated by reduction of the 6A amount.
The amount shown with 6A confirms your payment only.
The amount shown with 6B (below chapter Passenger Information) is being used for purchase of sustainable fuel (after reduction of applicable taxes and administrative fees)

¹ Der Nettobetrag ergibt sich nach Abzug des Betrags unter 6A.
Hinsichtlich des Betrags unter 6A handelt es sich hier lediglich um eine Zahlungsbestätigung.
Der Betrag unter 6B (siehe Passenger Information) stellt den Betrag dar, welcher in den Einkauf von sustainable fuel (nach Abzug von ggfs. anfallenden Steuern und internen Gebühren) investiert wird.

DE: Grenzüberschreitende Beförderung von Personen im Luftverkehr gemäß § 26(3) USTG